

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MATTHEW ELLISON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TUFIN SOFTWARE TECHNOLOGIES LTD.,
REUVEN KITOV, JACK WAKILEH,
REUVEN HARRISON, OHAD FINKELSTEIN,
EDOUARD CUKIERMAN, YAIR SHAMIR,
RONNI ZEHAVI, YUVAL SHACHAR, J.P.
MORGAN SECURITIES LLC, BARCLAYS
CAPITAL INC., JEFFERIES LLC,
OPPENHEIMER & CO. INC., ROBERT W.
BAIRD & CO. INCORPORATED, PIPER
JAFFRAY & CO., STIFEL, NICOLAUS &
COMPANY, INCORPORATED, WILLIAM
BLAIR & COMPANY, L.L.C., and D.A.
DAVIDSON & CO.,

Defendants.

Case No. 1:20-cv-05646-GHW

DAVID MICHAELSON, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TUFIN SOFTWARE TECHNOLOGIES LTD.,
REUVEN KITOV, JACK WAKILEH,
REUVEN HARRISON, OHAD FINKELSTEIN,
EDOUARD CUKIERMAN, YAIR SHAMIR,
RONNI ZEHAVI, and YUVAL SHACHAR,

Defendants.

Case No. 1:20-cv-06290-GHW

**NOTICE OF MOTION OF JOCELYN TAN PECK HIANG FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF
SELECTION OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF RECORD

PLEASE TAKE NOTICE that Jocelyn Tan Peck Hiang (“Tan”) respectfully moves this Court for an order: (1) consolidating the above-captioned actions; (2) appointing Tan as Lead Plaintiff pursuant to §27 of the Securities Act of 1933 (“Securities Act”), 15 U.S.C. §§77z-1, *et seq.*, as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”); (3) approving Tan’s selection of Scott+Scott Attorneys at Law LLP as Lead Counsel for the Class; and (4) granting such other relief as the Court may deem just and proper.

This motion is based on this Notice, the attached Memorandum of Law, the Declaration of Thomas L. Laughlin, IV in support thereof, including Exhibits A-D, and the Court’s complete files and records in the above-captioned actions, as well as such further argument as the Court may allow at a hearing on this motion.

DATED: September 21, 2020

Respectfully Submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Thomas L. Laughlin, IV
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*Counsel for Proposed Lead Plaintiff Jocelyn
Tan Peck Hiang and Proposed Lead Counsel
for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2020, I caused the foregoing Notice of Motion and the accompanying Memorandum of Law, Declaration of Thomas L. Laughlin, IV, with attached exhibits, and Proposed Order to be filed with the Clerk of the Court and served upon all counsel of record via the Court's CM/ECF system.

/s/ Thomas L. Laughlin, IV
Thomas L. Laughlin, IV